

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CONRAD SMITH, *et al.*,

Movants,

v.

RUDOLPH GIULIANI.

Respondent.

Civ. No. 1:24-mc-00351-ER (S.D.N.Y.)

[PROPOSED] ORDER ON MOTION TO COMPEL

It is ORDERED AND ADJUDGED that:

- (1) The September 10, 2024 motion to compel compliance with subpoena *duces tecum* served on Respondent Rudolph Giuliani (ECF No. 11) is **GRANTED**.
- (2) On or before July 21, 2025, Respondent **SHALL PRODUCE** to Movants all responsive documents that fall within the scope of Movants' subpoena (ECF No. 1, Ex. B.).

IT IS SO ORDERED.

On this ____ day of _____, 2025.

The Honorable Edgardo Ramos
United States District Court Judge